IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MISCELLANEOUS WAREHOUSEMEN'S)
LOCAL 781 HEALTH & WELFARE FUND,)
) CIVIL ACTION
Plaintiff,)
) NO. 14 C 3789
VS.)
) JUDGE SHARON JOHNSON COLEMAN
FAMOUS LUBRICANTS, INC., an Illinois corp.,)
Defendant.)

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, FAMOUS LUBRICANTS, INC., an Illinois corporation, in the total amount of \$24,452.73, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$929.75.

On May 29, 2014, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Vaughn Hapeman) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on June 19, 2014. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

|--|

Patrick N. Ryan Attorneys for the Plaintiff BAUM SIGMAN AUERBACH & NEUMAN, LTD. 200 West Adams Street, Suite 2200 Chicago, IL 60606-5231

Bar No.: 6278364

Telephone: (312) 216-2573 Facsimile: (312) 236-0241

E-Mail: pryan@baumsigman.com

 $I:\label{lem:lemons} I:\label{lemons} I:\label{lemons}$

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 27th day of June 2014:

Mr. James R. Goodale, Registered Agent Famous Lubricants, Inc. 124-132 W. 47th Street Chicago, IL 60609

/s/ Patrick N. Ryan

Patrick N. Ryan Attorney for Plaintiffs BAUM SIGMAN AUERBACH & NEUMAN, LTD. 200 West Adams Street, Suite 2200 Chicago, IL 60606-5231

Bar No.: 6278364

Dar 110.: 02/8304 Telephone: (312) 216.

Telephone: (312) 216-2573 Facsimile: (312) 236-0241

E-Mail: pryan@baumsigman.com

I:\781W\Famous Lubricants\#25214\motion.pnr.df.wpd